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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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	:	
<b>In re:</b>	:	<b>Chapter 11</b>
	:	
<b>LEHMAN BROTHERS HOLDINGS INC., et al.,</b>	:	<b>Case No. 08 – 13555 (SCC)</b>
	:	
<b>Debtors.</b>	:	<b>(Jointly Administered)</b>
	:	<b>Hearing Date: Nov. 13, 2015</b>
	:	<b>Hearing Time: 12:00 p.m. (EST)</b>
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**RENEWAL OF OBJECTION OF THE ONTARIO TEACHERS'  
PENSION PLAN BOARD TO THE DEBTORS' MOTION TO  
ALLOW DISCLOSURE OF THE DERIVATIVE QUESTIONNAIRES**

The Ontario Teachers' Pension Plan Board ("**OTPPB**") — a creditor of Lehman Brothers Holdings Inc. ("**LBHI**") and its Affiliated Debtors<sup>1</sup> (LBHI together with its Affiliated Debtors, the "**Debtors**") that submitted a Derivative Questionnaire in the above-captioned proceeding — by and through their undersigned counsel, hereby renews (this "**Renewal**") the objection set forth in its Joinder [Docket No. 49118] (the "**Joinder**") in the (i) Objection of Derivative Questionnaire Respondents [Docket No. 49040] (the "**Derivative Questionnaire Respondents' Objection**") to Motion to Allow Disclosure of the Derivative Questionnaires Pursuant to Section

<sup>1</sup> Capitalized terms used but not otherwise defined herein have the meaning ascribed to them in the Original Disclosure Motion (as defined below).

107(a) of the Bankruptcy Code [Docket No. 48939] (the “**Original Disclosure Motion**”), and (ii) Objection of Citadel Energy Investments Ltd. and Citadel Equity Master Fund Ltd. [Docket No. 49030] (the “**Citadel Objection**”) to the Original Disclosure Motion, and hereby objects to the Debtors’ Motion to Renew the Original Disclosure Motion [Docket No. 51312] (the “**Renewed Disclosure Motion**”; together with Original Disclosure Motion, the “**Disclosure Motions**”), notwithstanding the confidentiality provisions set forth in the Court’s Order Pursuant to Section 502(b)(9) of the Bankruptcy Code and Bankruptcy Rule 3003(c)(3) Establishing the Deadline for Filing Proofs of Claim, Approving the Form and Manner of Notice Thereof and Approving the Proof of Claim Form [Docket No. 4271] (the “**Bar Date Order**”).

In support of the Joinder and this Renewal, the OTPPB respectfully states as follows:

### **FACTS**

1. On July 2, 2009, the Court entered the Bar Date Order.
2. On March 19, 2015, Movants filed the Original Disclosure Motion.
3. On March 30, 2015, the Derivative Questionnaire Respondents’ Objection was filed.
4. On March 30, 2015, the Citadel Objection was filed.
5. On April 1, 2015, the OTPPB filed the Joinder.
6. On April 2, 2015, Movants filed a Notice of Adjournment of Hearing [Docket No. 49157] on the Original Disclosure Motion.
7. On October 30, 2015, Movants filed the Renewed Disclosure Motion.

### **ARGUMENT**

8. The legal and factual bases for this Renewal are set forth at length in the Derivative Questionnaire Respondents’ Objection, the Citadel Objection and the Joinder. Rather

than burden the Court with a duplicative filing, the OTPPB hereby fully renews and incorporates the Derivative Questionnaire Respondents' Objection, the Citadel Objection and the Joinder as if fully set forth herein.

**RESERVATION OF RIGHTS**

9. The OTPPB reserves its rights to amend or supplement this Renewal and the Joinder, and to incorporate other objections to the Disclosure Motions filed by other parties in interest in any subsequent joinder or renewal filed with the Court or at the hearing to consider the Disclosure Motions.

**CONCLUSION**

WHEREFORE, for the foregoing reasons, the OTPPB respectfully requests that this Court deny the Disclosure Motions and grant such other and further relief as it may deem just and proper under the circumstances.

Dated: New York, New York  
November 6, 2015

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